

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

JASON W. GALANIS,  
JOHN P. GALANIS,  
JARED M. GALANIS,  
DEREK M. GALANIS,  
GARY T. HIRST, and  
GAVIN L. HAMELS,

Defendants.

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NOTICE OF MOTION

ECF Case

No. 15 Civ. 7547 (VSB)

PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in criminal case United States v. Jason Galanis et al., 15 Cr. 643 (PKC) (the “criminal action”); and the accompanying memorandum of law, the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, will move this Court for an order (1) permitting the United States to intervene in the above-captioned case, pursuant to Federal Rule of Civil Procedure 24; and (2) staying depositions, interrogatories, requests for admission, and production of transcripts of testimony and notes of interviews with, and any form of discovery that would create statements of, any person whom the Government

asserts may be called as a witness in the criminal action, until the conclusion of the criminal action, as well as for such other relief as the Court deems just and proper.

Dated: New York, New York  
October 19, 2015

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/  
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